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Attorney for MARGE SIMPSON

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARGE SIMPSON, *et al.*,

Defendants.

Case No. CR 07-00123 ABC

**EX PARTE APPLICATION AND
DECLARATION OF LIONEL HUTZ IN
SUPPORT OF MARGE SIMPSON'S
REQUEST FOR AUTHORIZATION OF
COSTS FOR NECESSARY DEFENSE
EXPENDITURES,
18 U.S.C. § 3006A [PARALEGAL]**

FILED IN CJA CONFIDENTIAL FILE

Pursuant to the Criminal Justice Act, Marge Simpson hereby applies ex parte for authorization of costs for necessary defense expenditures. In support of this application, Mrs. Simpson submits the declaration of her counsel, Lionel Hutz, which is attached hereto and incorporated herewith.

I, LIONEL HUTZ, make the following declaration under penalty of perjury:

1. I am an attorney at law duly admitted to practice in the State of California and admitted to the bar of this Court. By appointment under the Criminal Justice Act, I represent defendant Marge Simpson in the above-captioned matter. Unless otherwise noted, I make this declaration of my own personal knowledge, and if called as a witness, I could and would testify competently to the contents hereof.

**EX PARTE APP AND DEC IN SUPP OF
ORDER FOR PARALEGAL COSTS**

--Case No. CR 07-00123 ABC (Simpson)

1 2. Mrs. Simpson is charged with the following offenses: Distribution and Possession
2 with Intent to Distribute 3, 4 methylenedioxymethamphetamine in violation of Title 21, U.S.C. §
3 841 (a)(1) & (b)(1)(C); Distribution and Possession with Intent to Distribute Marijuana, in
4 violation of Title 21, U.S.C., § 841 (a)(1) and (b)(1)(B)(vii); Conspiracy to Distribute and Possess
5 with Intent to Distribute Marijuana and 3,4 methylenedioxymethamphetamine in violation of Title
6 21, U.S.C. § 846; and Aiding and Abetting in violation of Title 18 U.S.C. § 2. This is a multi-
7 defendant case (19 people are currently charged as co-defendants), and the case involves the use
8 of cell phone wire-taps that span a period of approximately fifteen months. Undersigned counsel
9 understands that there are over two thousand pages of discovery and compact discs containing
10 conversations in this case.

11 3. This is Mrs. Simpson's first request for authorization of funds for a paralegal.
12 Undersigned counsel anticipates the use of the services of Selma Bouvier, a paralegal in my
13 office, as follows:

- 14 (a) Consolidating and organizing the discovery in this case; and
15 (b) Reviewing and summarizing the discovery, including phone call
16 transcripts and telephone calls that are not transcribed.

17 Ms. Bouvier has experience reviewing wiretaps therefore I request that her hourly
18 rate be \$55.00. Based on my review of the case thus far, I estimate that she will devote
19 approximately 60 hours to this case.

20 5. Accordingly, I respectfully request the following orders:

- 21 (a) authorization for the amount of \$3,300, at the rate of \$55 an hour, for the
22 services of Selma Bouvier as a paralegal for Mrs. Simpson; and

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- 27 (b) the filing in the CJA Confidential File of this Ex Parte Application and

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**EX PARTE APP AND DEC IN SUPP OF
ORDER FOR PARALEGAL COSTS**

--Case No. CR 07-00123 ABC (Simpson)

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Declaration of Lionel Hutz in Support of Marge Simpson’s First Request
for Authorization of Costs for Necessary Defense Expenditures, 18 U.S.C.
§ 3006a (Paralegal), and the [Proposed] First Order Authorizing Costs for
Necessary Defense Expenditures for Jeffrey Chan, 18 U.S.C. § 3006a.

Executed under penalty of perjury of the laws of the United States, at San Francisco,
California, this 11th day of August of 2007.

Lionel Hutz
Attorney for MARGE SIMPSON